

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Periodic Reporting
(Proposal Four)

Docket No. RM2016-12

**MOTION OF PUBLIC REPRESENTATIVE FOR LEAVE TO RESPOND TO REPLY
COMMENTS AND EXPERT MATERIALS SUBMITTED BY UNITED STATES
POSTAL SERVICE AND AMAZON FULFILLMENT SERVICES, INC.**

(November 22, 2016)

United Parcel Service, Inc. ("UPS") submitted a Motion of United Parcel Service Inc. for Leave to File a Response to Reply Comments and Expert Materials Submitted by United States Postal Service and Amazon Fulfillment Services, Inc., November 21, 2016 ("UPS Motion"). UPS supported its motion by noting, among other issues, that the Reply Comments of United Postal Service ("Postal Service") and Amazon Fulfillment Services, Inc. ("Amazon") misconstrued many important points of its Comments. The Public Representative supports the UPS Motion because the Postal Service's and Amazon's Reply Comments were extensive, and this docket is not currently structured to allow parties to respond to criticisms of Reply Comments which raise new questions.

The Public Representative believes the Postal Service and Amazon have also misconstrued important issues in its Comments. The Commission would benefit from learning the Public Representative's response to criticisms of its Comments and the implications of the erroneous arguments made by the Postal Service and Amazon, even though the Public Representative's Comments were not subject to the same degree of criticism as UPS's Comments.

Wherefore, the Public Representative requests leave to file a response to the Reply Comments of the Postal Service and Amazon at the same time that the Commission provides for a response by UPS to these Reply Comments.

Respectfully Submitted,

By: /s/ Lawrence Fenster

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